

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Obj. Deadline: November 27, 2023 at 4:00 p.m. (ET)**

**NOTICE OF FIRST MONTHLY APPLICATION OF MORRIS JAMES LLP,  
AS DELAWARE COUNSEL TO THE OFFICIAL COMMITTEE OF  
EQUITY SECURITY HOLDERS, FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
SEPTEMBER 7, 2023 THROUGH SEPTEMBER 30, 2023**

**PLEASE TAKE NOTICE** that on November 6, 2023, Morris James LLP (“Morris James”), filed its First Monthly Application (the “Application”) seeking compensation for services rendered and reimbursement of expenses incurred as Delaware Counsel to the Official Committee of Equity Security Holders appointed in the above-referenced bankruptcy case (the “Committee”) for the period from September 7, 2023 through September 30, 2023 (the “Compensation Period”).

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **November 27, 2023 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon Committee’s counsel:

**BROWN RUDNICK LLP**

Robert J. Stark, Esquire  
Bennett S. Silverberg, Esquire  
7 Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
Facsimile: (212) 209-4801  
E-mail: rstark@brownrudnick.com  
E-mail: bsilverberg@brownrudnick.com

**MORRIS JAMES LLP**

Eric J. Monzo, Esquire  
Brya M. Keilson, Esquire  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: emonzo@morrisjames.com  
E-mail: bkeilson@morrisjames.com

and

Matthew A. Sawyer, Esquire  
One Financial Center  
Boston, MA 02111  
Telephone: (617) 856-8200  
Facsimile: (617) 856-8201  
E-mail: msawyer@brownrudnick.com

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: November 6, 2023

/s/ Brya M. Keilson  
Brya M. Keilson (DE Bar No. 4643)